

### **REMARKS**

Claims 1-17 are currently pending, wherein claims 1, 2, 5, 7-9, 12, and 14-16 have been amended to even more clearly define the present invention and new claim 17 has been added.

In paragraph 3 of the Office action ("Action"), the Examiner rejects claims 1-7 and 10-16 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0065777 to Mattila et al. ("Mattila"), in view of U.S. Patent Application Publication No. 2004/0057442 to Westman et al. ("Westman"). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. § 103, the Examiner must establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness three criteria must be met. First, there must be some motivation to combine the cited references. Second, there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 1, 2, 5, 7-9, 12, and 14-16 are not rendered unpatentable by the combination of Mattila and Westman because the combination fails to disclose each and every claimed element as discussed below.

The present invention is directed to a method and system for managing customer accounts in connection with a pre-paid platform. The invention is based on arranging the applications to communicate with a proxy and the pre-paid platform correspondingly with a charging module, so that the proxy and the charging module communicate with each other in a logically predefined manner. The proxy is used to collect and control the rate and other related information associated with services requested by the customer and the charging module is used to bill the customer's pre-paid account, which is configured to receive a predefined format. Accordingly, the claimed invention includes, *inter alia*, using a charging module to charge a customer's pre-paid account by converting charging information received from the proxies into a format understood by the Pre-Paid platform.

Mattila discloses a system and method for controlling access to downloadable services in a network. The system includes a download server DLS 102 which provides facilities for charging, including a pre-paid charging model. However, nowhere in Mattila is there any disclosure of the DLS server 102 converting charge information received from a proxy to a

format understood by the pre-paid platform as claimed. To the contrary, Mattila merely discloses utilizing some form of pre-paid billing model.

Westman discloses a communication system and method for establishing a connection to a serving network element. However, Westman fails to overcome the deficiencies of Mattila. Since Mattila and Westman both fail to disclose or suggest a method of managing customer accounts in connection with a Pre-Paid platform that includes receiving charge data from a proxy and converting the charge data to a predefined format accepted by the pre-paid platform, the combination of these two references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine Mattila and Westman, the combination would still fail to render claims 1, 2, 5, 7-9, 12, and 14-16 unpatentable because the combination fails to disclose each and every claimed element. Reconsideration and withdrawal of the rejection of claims 1, 2, 5, 7-9, 12, and 14-16 under 35 U.S.C. § 103(a) is respectfully requested.

In paragraph 4 of the Action, the Examiner rejects claims 8 and 9 under 35 U.S.C. § 103(a) as being unpatentable over Mattila and Westman, further in view of U.S. Patent No. 6,724,748 to Stille et al. ("Stille"). Applicants respectfully traverse this rejection.

Claims 8 and 9 depend from independent claim 1. Therefore, claims 8 and 9 are patentable over the combination of Mattila and Westman for the same reasons presented above with respect to claim 1. Stille discloses a method and system for creating an interface between a packet-switched network and an IN. However, Stille fails to overcome the deficiencies of Mattila and Westman.

Since Mattila, Westman, and Stille each fail to disclose or suggest a method of managing customer accounts in connection with a Pre-Paid platform that includes receiving charge data from a proxy and converting the charge data to a predefined format accepted by the pre-paid platform as claimed, the combination of these three references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine Mattila, Westman, and Stille, the combination would still fail to render claims 8 and 9 unpatentable because the combination fails to disclose each and every claimed element. Reconsideration and withdrawal of the rejection of claims 8 and 9 under 35 U.S.C. § 103(a) is respectfully requested.

New claim 17 is patentable over the cited prior art for at least the reason that the cited prior art fails to disclose or suggest a method of: A method for managing customer accounts in connection with a Pre-Paid platform that includes, *inter alia*, receiving, at a proxy, a request for service from a subscriber; determining, at the proxy, a service code associated with the requested service; sending charge data, including the service code, to a charging module; converting, in the charging module, the received charge data and service code into a predefined format accepted by the Pre-Paid platform; sending the converted charge data to the Pre-Paid platform; receiving an indication from the Pre-Paid platform as to whether the subscriber has an adequate balance to cover the requested service; and controlling, by the proxy, whether or not the requested service is provided based on the received indication.

### CONCLUSION

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Penny L. Caudle Reg. No. 46,607 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

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Respectfully submitted,

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